

Carlos Makoto Taitano, State Bar No. 275820
Taitano & Taitano LLP
P.O. Box 326204
Hagatna, Guam 96932
Telephone: (671) 777-0581
Email: cmakototaitano@taitano.us.com

Attorney for Applicant
Ho Chan Kim

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re Ex Parte Application of)
) Case Number:
Ho Chan Kim,)
) **DECLARATION OF HO CHAN KIM IN**
) **SUPPORT OF HO CHAN KIM'S EX**
Applicant.) **PARTE APPLICATION FOR ORDER**
) **PURSUANT TO 28 U.S.C. § 1782**
) **AUTHORIZING DISCOVERY FOR USE**
) **IN FOREIGN PROCEEDINGS**

I, Ho Chan Kim, declare that:

1. I am more than 21 years of age, am competent to testify on the matters stated in this declaration, and, except as may be otherwise stated in this declaration, have personal knowledge of the matters stated in this declaration.

2. I am a Pastor in the Republic of Korea at Life Word Mission, an unincorporated association under the laws of the Republic of Korea, which is a South Korean Christian religious mission.

3. I reside in the Republic of Korea and my address is located in Gyeonggido, Republic of Korea.

4. My name in Korean is written as 김호찬 (Kim Ho Chan).

5. This declaration is in support of my Ex Parte Application for an Order Pursuant to 28 U.S.C. § 1782 Authorizing Discovery for Use in Foreign Proceedings.

6. Many believers of Life Word Mission view information about Life Word Mission online by searching for Life Word Mission and its pastors on the Google search engine.

7. An anonymous individual (hereinafter “**Anonymous Individual**”), using the YouTube channel named “*A Fisherman Catching a Fish*” (“생선잡는어부” in the original Korean language) (hereinafter “**YouTube Channel**”) located at <https://www.youtube.com/@Bok72> published a YouTube video concerning me at https://www.youtube.com/watch?v=Q2Yo_n2Q5_E (hereinafter “**YouTube Video**”) in which the Anonymous Individual insults and states various falsities concerning me; attached as **Exhibit 1** is a true and correct screenshot of the YouTube Video as of May 17, 2024.

8. The handle of a YouTube channel is the web address of the channel that is indicated after <https://www.youtube.com/>, and for the YouTube Channel is @BoK72.

9. The words that constitute the YouTube Channel, which are 생선 means “fish” in Korean, “잡는” means catching in Korean, and “어부” means fisherman in Korean, and therefore, literally means a fisherman catching fish.

10. In Korean, Life Word Mission is spelled “생명의말씀선교회”, and 생명 means life and 선교회 means mission.

11. The first letter of the word fish (생선) in Korean which is 생 is the same as the first letter of the word life (생명) in Korean, and the second letter of the word fish in Korean 선 is the first letter of the word mission (선교회) in Korean; and the word 생선 in Korean means fish and also Life Mission in Korean, and as such, has a double meaning.

12. For the above reasons, the YouTube Channel name in addition to its literal meaning, has the meaning: a fisherman (i.e., the channel owner) targeting Life Word Mission.

13. The various videos published by the YouTube Channel focus on defaming and stating falsities about Life Word Mission, and the YouTube Video takes direct aim at me to defame and harm my reputation.

14. The YouTube Video states falsities about, defames, and insults me as a Pastor at Life Word Mission.

1 15. The false, defamatory, and insulting statements being made in the YouTube Video
2 have caused me significant emotional, psychological, and mental harm, and because of this harm,
3 whenever I deliver a talk to the believers of Life Word Mission, I suffer from being reminded of
4 the YouTube Video and the various falsities and insults contained therein.

5 16. I further suffer from sleep disorder caused by the YouTube Video, and I have been
6 diagnosed with depression caused by the YouTube Video.

7 17. The YouTube Video has significantly harmed my good name within the community,
8 and my reputation has been tarnished.

9 18. In the YouTube Video at 0:44, the Anonymous Individual states “this duplicitous,
10 perverse missionary”, which are extremely insulting words when stated in the Korean language
11 that the Anonymous Individual describes me with.

12 19. In the YouTube Video from 1:15 to 1:26, the Anonymous Individual falsely states
13 that I molested a local sister; I have never molested a sister, whether local or not.

14 20. In the YouTube Video from 1:53 to 1:58, the Anonymous Individual states “filthy,
15 disgusting behavior”, which are extremely insulting words when stated in the Korean language
16 that the Anonymous Individual describes me with.

17 21. In the YouTube Video from 2:07 to 2:22, the Anonymous Individual falsely states
18 that I drank alcohol, and that I molested a local sister; I did and do not drink alcohol, which is a
19 sin under the teachings of Life Word Mission, nor have I ever molested a sister, whether local or
20 not.

21 22. In the YouTube Video from 3:08 to 3:18, the Anonymous Individual falsely states
22 that I committed a secret fraud, that I drank alcohol, and that I molested local women; all of these
23 statements are plainly false, as I never committed any fraud, I did not and do not drink alcohol,
24 nor have I ever molested any women.

25 23. In the YouTube Video from 5:54 to 5:55, the Anonymous Individual insults me by
26 stating that I am “just a horrible, disgusting human being” which are extremely insulting words
27 when stated in the Korean language that the Anonymous Individual describes me with.
28

1 24. As of May 17, 2024, the YouTube Video has been viewed more than 9,300 times,
2 and the video has significantly defamed my good name and my reputation within the Life Word
3 Mission community.

4 25. In the YouTube Video from 0:44 to 0:56, the Anonymous Individual states “This
5 duplicitous, perverse missionary, is a name most people in Life Word know by heart. He spent
6 many years in missionary work overseas and served as the general pastor in charge in that country”.

7 26. In the YouTube Video from 2:53 to 2:59, the Anonymous Individual states
8 “Meanwhile, his profile picture in KakaoTalk shows his offspring getting married within the
9 church”.

10 27. Although the YouTube Video does not explicitly state my name, all believers of
11 Life Word Mission can easily identify me from the above statements contained in the YouTube
12 Video, because I conducted missionary work as a general pastor in Mongolia, and there are two
13 general pastors returning to Korea from overseas missionary work at Life Word Mission, and I am
14 the one whose daughter got married recently of the two general pastors.

15 28. Because it is obvious who the YouTube Video is speaking about, in the comments
16 section of the YouTube Video, commenters state my name 김호찬 by connecting words that have
17 the initials of my name in their comments, or through word play by placing words vertically that
18 start with the initials of my name; attached as **Exhibit 2** and **Exhibit 3** are true and correct
19 screenshots of comments in the comments section of the YouTube Video, with a red circle added
20 showing the initials of my name.

21 29. I have filed a civil lawsuit against the Anonymous Individual in the Suwon District
22 Court, Anyang Branch Court, in the Republic of Korea, Civil Case Number 2024Gaso117176, for
23 defamation and insulting (hereinafter “**Civil Case**”).

24 30. I have been unable to identify the true identity of the Anonymous Individual,
25 preventing me from proceeding with the Civil Case against the Anonymous Individual.

26 31. Unless the true identity of the Anonymous Individual is revealed, I will be unable
27 to pursue the Civil Case against the Anonymous Individual.
28


1 32. The identity of the Anonymous Individual will only be used for the purpose of the
2 Civil Case.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed on June 14, 2024.




HO CHAN KIM



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(구원파/사이비/이단)생명의말씀선교회 전도하라고 파송 보냈더니 죄짓고 이중생활하는 해외선교 파송 출신 목사!

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피해를 입은 분들을 위한 채널입니다. ...more

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아씨 김밥은 좋아하는데 ㅠ ㅜ



13



Reply



@choi783 5 months ago

누구인가요?



12



Reply

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@user-he4wi4fy4s 5 months ago

영상 말미에 피해 자매님 때문에 언급못한다고.....



1



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@user-rp1qh1hx2e 5 months ago (edited)

김밥 은 맛있습니다

호빵 도 맛있죠

찬 찬찬



15



Reply



@saengsunjapi 5 months ago

@user-rp1qh1hx2e 시원하네요 ㅋㅋㅋㅋㅋㅋㅋ 그 인간 부끄러움은 알라나 몰라요. ㅋ
ㅋㅋㅋㅋㅋ 지도 딸만 키우면서..... 딸들도 성격아주 ㅋㅋㅋ 똑닭아서 ㅋㅋㅋ 할말하않



12



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